



STATE OF WASHINGTON

PUBLIC DISCLOSURE COMMISSION

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December 2, 2005

The Honorable Rob McKenna  
Attorney General of the State of Washington  
PO Box 40100  
Olympia, WA 98504-0100

Dear General McKenna:

On September 27, 2005, your office received a citizen action letter from Richard Shepard alleging that King Broadcasting Company (KBC) violated RCW 42.17.640 by making contributions to candidates that exceeded the allowable limits. Your office forwarded the letter to the Public Disclosure Commission for investigation.

At the Commission's meeting on November 30, 2005, the PDC staff reported the results of its investigation. A copy of the staff memorandum is enclosed. The investigation revealed insufficient evidence to prove that the activity of KBC in inviting gubernatorial debate participants and in conducting polling for broadcast in a regularly scheduled news medium that is of primary interest to the general public constitutes a contribution under RCW 42.17.020(14)(b)(vi). A copy of the investigation report is enclosed. The Commission reviewed the memorandum and report, as well as a November 28, 2005 letter from Mr. Shepard and a November 29, 2005 letter from Stuart R. Dunwoody, attorney for KBC. Copies of those letters are enclosed.

The Commission unanimously voted to accept the PDC staff's recommendations that no further action is warranted on the complaint. This letter conveys the Commission's determination that no further action will be taken by the Commission on this complaint, and the Commission's recommendation that no action be taken by the Attorney General.

If we can be of assistance, please contact me at [vrippie@pdc.wa.gov](mailto:vrippie@pdc.wa.gov) or 586-4838.

Sincerely,

Vicki Rippie  
Executive Director



C: Senior Assistant Attorney General Linda Dalton  
Senior Counsel Nancy Krier  
Richard Shepard  
Stuart R. Dunwoody

Enclosures: Staff Report  
Report of Investigation  
November 28, 2005 Letter from Richard Shepard  
November 29, 2005 Letter from Stuart R. Dunwoody